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**UNITED STATES BANKRUPTCY COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC. *et al.*,<sup>1</sup>  
Debtors.

JON GIACOBBE,

Plaintiff,

v.

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,  
Defendants.

Chapter 11

Case No. 22-10943 (MEW)  
(Jointly Administered)

Adversary No. 22-01145 (MEW)

“Complaint to Determine Dischargeability  
of Debt per 11 U.S.C. § 523(a)(2)(A)”

**DEBTORS’ NOTICE OF MOTION TO DISMISS AND MEMORANDUM IN SUPPORT**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of the Debtors’ Motion to Dismiss, Dated October 14, 2022, the Debtors move this Court, before the Honorable Michael E. Wiles, at the Alexander Hamilton U.S. Custom House, One Bowling Green, New York, NY, for an Order dismissing Plaintiff’s Complaint to Determine

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

Dischargeability of Debt per 11 U.S.C. § 523(a)(2)(A) pursuant to the Federal of Bankruptcy  
Procedure 7012 and Federal Rule of Civil Procedure 12(b)(6).

New York, New York  
Dated: October 14, 2022

By: /s/ Joshua A. Sussberg, P.C.  
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